



February 3, 2020

VIA ECF & FAX

The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Michael Avenatti*
 No. 19 Cr. 373 (PGG)**

Dear Judge Gardephe:

I write on behalf of myself, Andrew Michaelson, and David Simons, counsel for Interested Party NIKE, Inc. ("Nike"), to respectfully request and move for permission to bring electronic devices to court during trial in the above-referenced matter. The Government has informed Nike that it intends to call one or more of its in-house lawyers to testify at trial. In addition, Defendant Michael Avenatti has subpoenaed multiple Nike attorneys (both in-house and outside counsel), as well as three of Nike's non-lawyer employees to testify in his defense case. The devices identified in the accompanying proposed order will assist us in our representation of Nike, including matters related to the protection of attorney-client privilege.

Respectfully submitted,

/s/Peter M. Skinner
Peter M. Skinner

cc: All parties (by ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____ x

IN THE MATTER OF AN APPLICATION
TO BRING PERSONAL ELECTRONIC DEVICE(S)
OR GENERAL PURPOSE COMPUTING DEVICE(S)
INTO THE COURTHOUSES OF THE
SOUTHERN DISTRICT OF NEW YORK
FOR USE IN A PROCEEDING OR TRIAL

_____ x

The following Order is subject to the definitions, obligations and restrictions imposed pursuant to Standing Order M10-468, as Revised. Upon submission of written application to this Court, it is hereby

ORDERED that the following attorney(s) are authorized to bring the Personal Electronic Device(s) and/or the General Purpose Computing Device(s) (collectively, "Devices") listed below into the Courthouse for use in a proceeding or trial in the action

captioned _____

_____, No. _____.

The date(s) for which such authorization is provided is (are) _____.

Attorney	Device(s)
1.	
2.	
3.	

(Attach Extra Sheet If Needed)

The attorney(s) identified in this Order must present a copy of this Order when entering the Courthouse. Bringing any authorized Device(s) into the Courthouse or its Environs constitutes a certification by the attorney that he or she will comply in all respects with the restrictions and obligations set forth in Standing Order M10-468, as Revised.

SO ORDERED:

Dated: _____

United States Judge